

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

D-1 Curtis Currie Crawford,

D-2 Jaylon Decarlo Williams

Case: 2:23-mj-30146

Assigned To : Unassigned

Assign. Date : 4/10/2023

Case No.

Description: RE: CURTIS

CRAWFORD, JAYLON WILLIAMS
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 18, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2119

Carjacking

18 U.S.C. § 924(c)(1)(A)

Use of a firearm during and in relation to a crime of violence

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: April 10, 2023City and state: Detroit, MI
Complainant's signatureChristopher S. Pennisi, Special Agent, FBI
Printed name and title
Judge's signatureHon. David R. Grand, United States Magistrate Judge
Printed name and title

AFFIDAVIT

I, Christopher S. Pennisi, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I am employed as a Special Agent of the Federal Bureau of Investigation for eighteen years, and currently assigned to the Violent Crime Squad in the Detroit Division of the FBI.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2501(7), that is, an officer of the United States who is empowered by the law to conduct investigations of and to make arrests for the offenses enumerated in 18 U.S.C. § 2516.

3. I have investigated federal violations concerning crimes of violence and firearms. I have gained experience through training and everyday work related to these types of investigations.

4. The statements contained in this Affidavit are based on my experience and background as a special agent and on information provided by police officers, other agents of the FBI, and other law enforcement personnel. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all of facts known to law enforcement related to this investigation.

5. This affidavit is made in support of a criminal complaint charging CURTIS CURRIE CRAWFORD and JAYLON DECARLO WILLIAMS with taking a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm in violation of 18 U.S.C. § 2119.

6. This affidavit is also made in support of a criminal complaint charging CRAWFORD and WILLIAMS with use of a firearm in relation to a crime of violence (carjacking) in violation of 18 U.S.C. § 924(c)(1)(A).

II. SUMMARY OF THE INVESTIGATION

7. On March 18, 2023, at approximately 11:49 pm, victim IA was sitting in his dark gray Chrysler 300 with Vehicle Identification Number (“VIN”) 2C3CCARG5GH136113 at an automated teller machine at the Bank of America located at 13900 Livernois in the city of Detroit.

8. As IA used the machine, a U-Haul marked box truck parked nearby and two black males exited from it. The two males approached IA, produced handguns, pointed them at IA and demanded that he exit the vehicle.

9. One of the handguns used by the carjackers was black and the other tan.

10. At least one of the carjackers physically touched IA by grabbing IA's wallet from him before he exited the car as shown in these images taken from Bank of America's surveillance cameras:



11. IA eventually complied with the gunmen's demands and exited the car, leaving behind his phone and keys.

12. One of the males entered the driver's seat of his vehicle and the other reentered the U-Haul. Both males then drove off in the respective vehicles.

13. Some of the surveillance video of IA's carjacking was published in local media by the Detroit Police Department in an effort to seek tips on the identity of the carjackers.

14. Between March 28 and 29, 2022, an anonymous tipster provided information that CURTIS CRAWFORD was involved in the carjacking of IA and uses cellular phone number 313-948-XXXX.

15. The tipster also explained that CRAWFORD'S girlfriend (hereinafter "KD") uses cellular phone number 248-757-YYYY, and that she rented the U-Haul truck used in the carjacking and purchased weapons for CRAWFORD.

16. U-Haul was contacted by Detroit Police, which provided the license plate of a truck recently rented by KD. A U-Haul truck with that same license plate was captured by area surveillance cameras driving towards 13900 Livernois immediately prior to the carjacking of IA.

17. On October 12, 2022, CURTIS CRAWFORD was stopped by Farmington Hills Police while driving a vehicle without a valid plate. At the time CRAWFORD did not have a valid driver's license. The car was searched prior to impoundment and a loaded 9mm Sig Sauer P320 handgun was found under the driver's seat. The gun was not registered anywhere in the United States.

18. A trace of the Sig Sauer P320 was conducted through the Bureau of Alcohol Tobacco Firearms and Explosives and found to have been purchased by KD on September 21, 2022.

19. On February 7, 2023, CURTIS CRAWFORD was stopped driving a blue 2016 Audi Q3 by Detroit Police on the wrong side of the roadway. CRAWFORD still had not obtained a valid driver's license, and was removed from the vehicle as a result. The car was searched in preparation for impoundment and a

loaded FN 509 9mm handgun bearing serial number GKS0269223 was found beneath the driver's seat.

20. A check of the LEIN database revealed that the blue 2016 Audi Q3 was registered to GC and KD.

21. The following day, KD called the Detroit Police Department and provided a statement that she and her mother are registered owners of the vehicle that CRAWFORD was stopped in and that CRAWFORD typically drives her around in it.

22. KD further explained that she purchased the FN 509 handgun three days prior to CRAWFORD being caught with it. KD stated that she stored the gun inside a box located in the trunk of her car and that CRAWFORD was aware of it.

23. CRAWFORD was interviewed by Detroit Police Officers and explained that the 2016 Audi he was driving was registered to his fiancée KD. He further admitted to knowing that a tan colored handgun that belonged to KD was under the driver's seat at the time he was stopped.

24. On March 8, 2023, KD visited Action Impact Firearm Range and Training Center in Southfield, Michigan and purchased a tan colored Sig Sauer model P320 handgun.

25. The tan Sig Sauer P320 that KD purchased on March 8 appeared to be the same color, make and model of the tan handgun used during the carjacking of

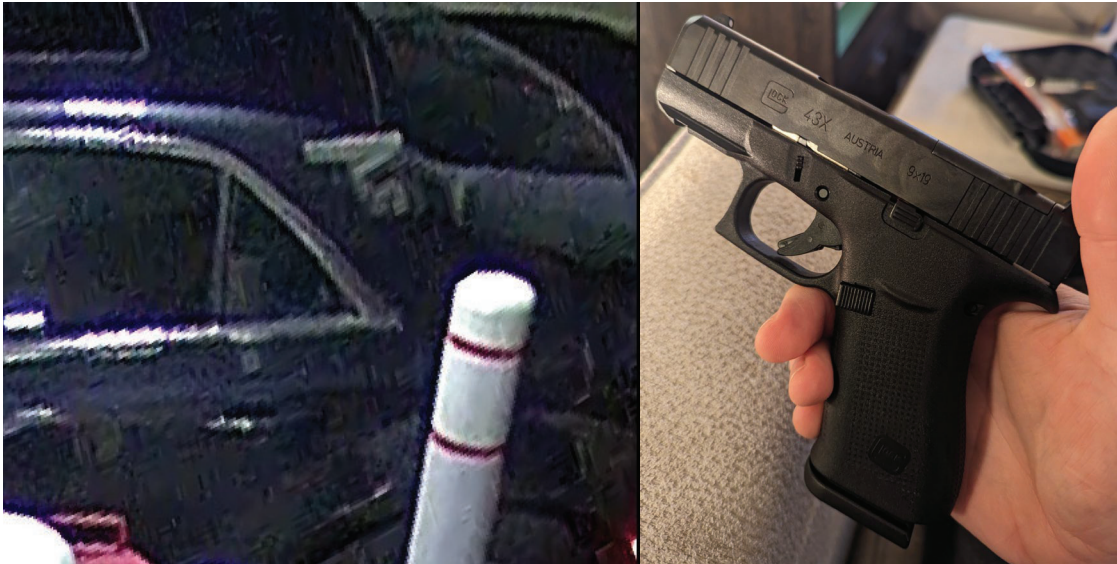
IA on March 18, 2023 by CRAWFORD as depicted below juxtaposed with a stock image of a tan Sig Sauer P320:



26. The second gunman who approached IA used a black handgun:



27. The black handgun used during the carjacking (depicted on the left) is juxtaposed below with a stock image of a Glock 43x in someone's hand (depicted on the right):



III. SUMMARY OF PHONE ANALYSES

28. On March 31, 2023, your affiant served a search warrant upon T-Mobile requesting call detail records for CRAWFORD'S phone number.

29. On April 3, 2023, those records were produced by T-Mobile and reviewed by an FBI expert in historical phone record analysis.

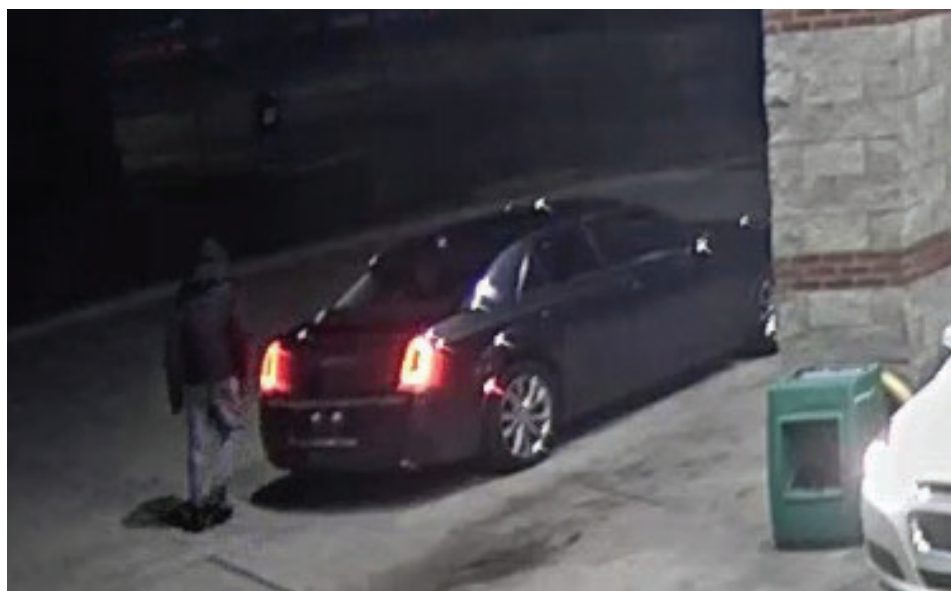
30. That review showed that the historical records for the device with the assigned number 313-948-XXXX, are consistent with the device being in the geographic area of 13900 Livernois on March 18, 2023 from 11:53 – 11:55 pm.

31. That is, CRAWFORD'S phone records indicate that the phone itself was in the area of the place where IA was carjacked at the time and date IA was carjacked.

32. Using the locations provided by CRAWFORD'S phone records as a guide, a search of Detroit Project Green Light surveillance video was conducted everywhere CRAWFORD stopped.

33. At approximately 1:02 am March 19, 2023, approximately one hour after the carjacking of IA, CRAWFORD'S phone was located in the geographic area of a gas station located at 17151 West 8 Mile.

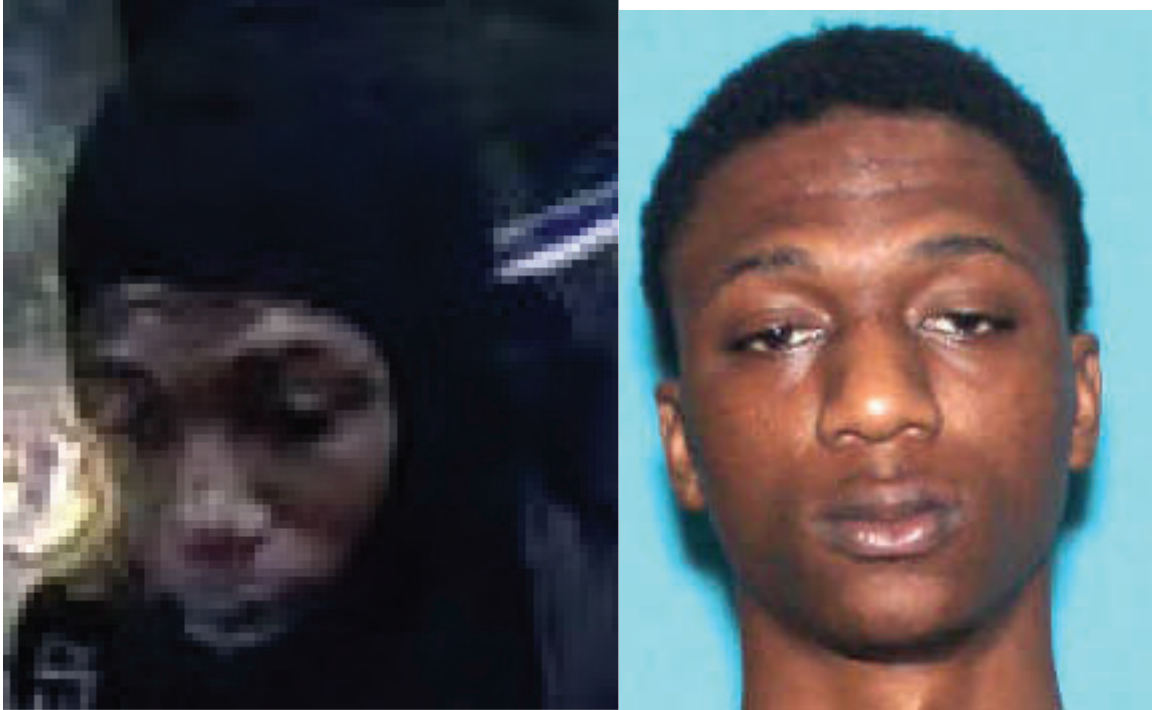
34. Review of the surveillance cameras located in and around the gas station located at 17151 West 8 Mile revealed the following picture of a Chrysler 300, much like IA's carjacked Chrysler 300, with a male exiting from it.



35. The male who exited the Chrysler 300 entered the gas station store, where the following image was captured:



36. Juxtaposed with CRAWFORD'S Secretary of State picture the male that exited Chrysler 300 appears to be CRAWFORD:



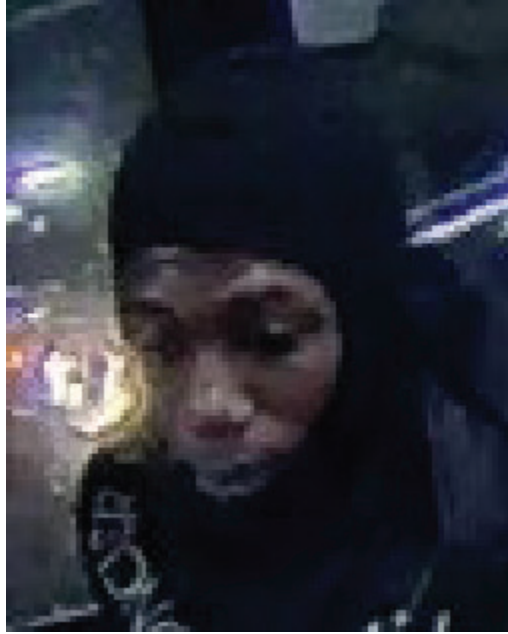
37. It should be noted that in the image capture of CRAWFORD from the gas station, he is wearing the same jacket that he wore in a video he posted to his Instagram account, “Curt Maskoff”, which was by the anonymous tipster described above:



38. On April 3, 2023, the Detroit Police Department Commercial Auto Theft Section received an anonymous tip from someone who stated that CURTIS CRAWFORD and JAYLON WILLIAMS were involved in the carjacking involving a U-Haul truck at the bank near the intersection of Livernois and Ewald Circle.

39. The caller further explained that CRAWFORD was wearing a ski mask during the carjacking.

40. The image taken of CRAWFORD from the gas station at 17151 West 8 Mile showed him wearing a ski mask:



41. The ski mask worn by CRAWFORD at the gas station appears to be the same ski mask worn during the carjacking as seen on the Bank of America surveillance cameras. The writing on his jacket also appears to be visible on the surveillance camera, although not as clear due to his movement on the video:



42. Based on the April 3 anonymous tip, a review of CRAWFORD'S phone records around the time of IA'S carjacking was conducted to determine if he was associated with JAYLON WILLIAMS.

43. The analysis revealed that one of CRAWFORD'S most frequently contacts was with the user of phone numbers 248-757-YYYY and 734-730-ZZZ. The 248 number was being used by KD at the time but the user of the 734 number was unknown.

44. On April 4, 2023, a search warrant was served on T-Mobile for subscriber information and call detail records for telephone number 734-730-ZZZZ. In response, T-Mobile provided records indicating that the subscriber for 734-730-ZZZZ was JAYLON WILLIAMS of 8-- S. Maple Road, Ann Arbor, Michigan.

45. WILLIAMS' phone records were reviewed by an FBI expert in historical phone record analysis.

46. That review showed that the historical records for the device with the assigned number 734-730-ZZZZ, are consistent with the device being in the geographic area of 13900 Livernois on March 18, 2023 from 11:53 – 11:55 pm.

47. That is, WILLIAMS' phone records indicate that the phone itself was in the area of the place where IA was carjacked at the time and date IA was carjacked.

IV. SEARCH WARRANT AND ARRESTS

48. On April 7, 2023, a search warrant was executed at WILLIAMS' home address in Ann Arbor, Michigan. Both WILLIAMS and CRAWFORD were discovered in the house.

49. Additional search warrants were executed at CRAWFORD and KD'S home addresses.

50. CURTIS CRAWFORD was taken into custody on a federal warrant charging receipt of a firearm while under indictment in connection with the above described carjacking (E.D.Mich. 23-mj-30144). WILLIAMS was taken into custody on his seven traffic warrants.

51. During the booking process, CRAWFORD was asked for his cellular phone number and told your affiant 313-948-XXXX.

52. CRAWFORD was interviewed after he voluntarily waived his Miranda rights wherein he confessed to being the male in the ski mask holding the tan gun during the carjacking of IA.

53. CRAWFORD explained that he used KD'S Sig P320 during the carjacking and that it was loaded at the time. He also confirmed that he drove IA's Chrysler 300 to the gas station located at 17151 West 8 Mile and then went inside the store. CRAWFORD stated that he grabbed IA'S wallet from him before IA got out his car during the carjacking. CRAWFORD also admitted to disposing of the

clothing he was wearing during the carjacking, including the jacket with lettering on it.

54. WILLIAMS was also interviewed after voluntarily waiving his Miranda rights and confessed to being the male holding the black gun during the carjacking of IA.

55. WILLIAMS explained that CURTIS was driving the U-Haul truck that KD had rented and suddenly said something like “there he go” after seeing IA at the automated teller machine. CURTIS pulled up to IA’S car and suddenly jumped out with a gun in his hand. WILLIAMS explained that the black gun he used during the carjacking was his own Glock 43X he open carries for self-defense purposes.

56. Seven guns – 5 pistols and 2 rifles – were recovered from WILLIAMS’ residence during execution of the search warrants on April 7 including two loaded Glock 43X handguns.

57. Finally, WILLIAMS told your affiant that his cellular phone number is 734-730-ZZZZ.

58. The VIN number assigned to IA’s Chrysler 300 indicated that it was made in Canada. Therefore, the vehicle was “transported in interstate commerce” as recited in 18 U.S.C. § 2119.

V. CONCLUSION

59. Based on the above information, probable cause exists that CRAWFORD and WILLIAMS, took a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm in violation of 18 U.S.C. § 2119 and brandished a firearm in relation to a crime of violence (carjacking) in violation of 18 U.S.C. § 924(c).


60. In consideration of the foregoing, I respectfully request that this Court issue a complaint and arrest warrants against CRAWFORD and WILLIAMS for violation of 18 U.S.C. §§ 2119 and 924(c)(1)(A).

Respectfully submitted,



CHRISTOPHER S. PENNISI
Special Agent, FBI

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HONORABLE DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Date: April 10, 2023